



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Southeast Regional Office • 20 Riverside Drive, Lakeville MA 02347 • 508-946-2700

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August 25, 2014

Mr. Michael Toomey
Boston Environmental Corporation
338 Howard Street
Brockton, MA 02302

RE: Determination of Technical Incompleteness
Application for: BWP SW 25
Corrective Action Design (CAD)
Transmittal Number: X254044

AT: Old Fall River Road Landfill
452 Old Fall River Road
Dartmouth, MA 02747
Facility #39200
Regulated Object #172451

Dear Mr. Toomey:

The Massachusetts Department of Environmental Protection ("MassDEP") has completed its technical review of the Corrective Action Design permit application (the "Application") listed above regarding final landfill grading and construction of a final cover system on the Old Fall River Road Landfill (the "Landfill") and determined that the application is Technically Incomplete.

The Application was prepared on behalf of Boston Environmental Corporation (the "Applicant") by SITEC Environmental, Inc. of Marshfield, Massachusetts and submitted to MassDEP on June 26, 2014. The permit application fee is recorded as being paid on July 1, 2014. On July 21, 2014, MassDEP issued a determination that the Application was Administratively Complete. On August 13, 2014, the Applicant met with MassDEP to discuss the status of MassDEP's review of the Application.

APPLICATION SUMMARY:

The following submittal represents the complete Application reviewed by MassDEP under 310 CMR 19.000 *Solid Waste Management Regulations* and MassDEP's *Landfill Technical Guidance Manual*, May 1997 ("Manual").

The Application consisted of transmittal form assigned number X254044, application form: BWP SW 25: Corrective Action Design, an Engineering Report, a Construction Quality Assurance Plan, Technical Specifications, and a set of Project Design Drawings, contained within a bound document entitled:

**Corrective Action Design
Old Fall River Road Landfill
452 Old Fall River Road
Dartmouth, MA
June 26, 2014**

The Application indicates that the closure/capping of the Landfill will be performed in accordance with MassDEP's "Reuse and Disposal of Contaminated Soil at Massachusetts Landfills Policy #COMM-97-001" dated August 15, 1997, and in accordance with an Administrative Consent Order: ACO-SE-14-4001 ("ACO"), dated March 28, 2014.

Based on its Technical Review of the Application, MassDEP has determined that the following information is required:

1. Pursuant to 310 CMR 19.011(2) all mapping and surveying shall be completed by a registered surveyor. Accordingly, the site plans indicating property lines must be stamped by a registered land surveyor.
2. Pursuant to Paragraph 54 A of the ACO and Section 2.2, page B-6 of the Application 926,000 cubic yards of materials will be utilized to achieve the grades shown on the submitted plans. A plan indicating cut and fill volumes shall be submitted.
3. Section 4.2, page B-14 of the Application provides a Material Acceptance, Screening, Tracking and Placement narrative and a Soils Handling Procedure. Pursuant to Paragraph 54 B of the ACO, the methods and procedures for testing and management of the soils must be discussed. Please provide more detail regarding soil pre-testing and evaluation and coordination between the personnel performing the pre-evaluation and the scale operator accepting the material on site.
4. Section 4.2.2, page B-15 of the Application states that processors who produce construction and demolition ("C&D") fines and residuals for this project must enter into agreements with the Applicant that require the processor to demonstrate that they have established a Gypsum Removal Plan and to "composite and analyze the fines and residuals " for sulfate content. Pursuant to Paragraph 54 B of the ACO, the CAD must include a discussion on the methods and procedures for testing the C&D fines and residuals for their sulfate content and the methods and procedures for the mixing of the

C&D fines and residuals with soil as predicated on the sulfate content of the C&D fines and residuals. Please provide additional detail.

5. Appendix B-3 of the Application is a Hazardous Waste Materials Management Plan. Reporting obligations under the Massachusetts Contingency Plan are included in section 4.0. Section 2.0 part 8 states that Suspect Asbestos Containing Materials ("SACM") may be encountered during existing waste relocation. Discuss the proposed notification protocol related to handling of SACM. State the level of proposed asbestos training for the Field Technician performing the ongoing inspection during waste relocation.
6. Specification 02140 regards Passive Gas Vents. Revise the text and drawing details to indicate that passive gas vents will extend to approximately the full depth of waste.
7. Drawing DET-1 provides details for stormwater basin construction. Provide additional details for the basin located above the Landfill final cover system.
8. Drawing DET-1 provides a Let-Down Channel Detail that proposes the use of Emulsion Mix. Provide a description of the Emulsion Mix. Indicate on this detail or on SP-4 the extent of rip-rap to be placed at outlet of the Basin No. 1 and No. 2 let-down channels to prevent scouring.
9. Drawing SP-4 indicates a stormwater collection area and outlet pipe at the base of the Landfill access road. Provide details for this outlet similar to the details on drawing DET-1 for basins 1 and 2. Also supplement the Stream Crossing Replacement Culvert Detail on drawing DET-1 to indicate the extent of the headwall and the extent of rip rap, if any, at the inlet and outlet. State that all road work and culvert work will be performed within the Old Fall River Road Landfill property limits.
10. Revise the discussion on materials proposed to be accepted in Section 4 to include only contaminated soils and C&D fines and residuals and state the maximum percentage by volume of C&D fines and residuals will be accepted.
11. Indicate the approximate location of the construction office trailer and utilities servicing the trailer and scale house.
12. State the proposed days and hours of operation based on various operational activities: waste acceptance, grading, capping activities etc.
13. Indicate the proposed pipe sizes for potential active gas system header pipes and indicate shut off valve locations on Drawing G-1.
14. Resubmit the data for the 44 test pits as a supplement to the Application.
15. Discuss activities related to the house relocation and water well decommissioning.
16. Provide a calculation demonstrating the stability of the final cover system under peak

storm conditions.

17. Discuss temporarily stockpiling grading and shaping materials.

18. Discuss status of review by the Division of Fisheries and Wildlife based on their July 15, 2013, correspondence regarding the MESA project review and the box turtle habitat.

Please contact me at (508) 946-2847 or Dan Connick at (508) 946-2884 if you have any questions. In all written responses please reference Transmittal # X254044.

Very Truly Yours,

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Mark Dakers, Chief
Solid Waste Management Section

D/DC

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